

**IN THE WEST VIRGINIA SENATE  
SECOND EXTRAORDINARY SESSION  
2018**

IN RE: The Matter of Impeachment Proceedings  
Against Respondent Retired Justice Robin Davis

**HOUSE OF DELEGATES' RESPONSES TO THE RESPONDENT'S REQUEST FOR  
DISCOVERY**

**WRITTEN/RECORDED STATEMENTS OF THE RESPONDENT**

1. Please see Exhibit Nos. 33 and 94
2. Interview with Kennie Bass in or about November of 2017
3. Statement of Justice Davis on August 14, 2018 regarding her retirement

The Board of Managers reserves the right to amend and/or supplement its response to this request.

**EXHIBITS**

1. Exhibit Nos. 1-74 which can be found on the West Virginia Legislature's website.
2. Exhibit Nos. 75-97 attached hereto.
3. Interview with Kennie Bass in or about November of 2017
4. Statement of Justice Davis on August 14, 2018 regarding her retirement

The Board of Managers reserves the right to amend and/or supplement its response to this request.

**WITNESS LIST**

1. Justice Allen Loughry
2. Chief Justice Margaret Workman
3. Justice Elizabeth Walker
4. Retired Justice Robin Davis

5. Former Justice Menis Ketchum
6. Former Justice Brent Benjamin
7. Senior Status Judge Thomas Keadle
8. Judge Thomas W. Steptoe
9. Judge John Cummings
10. Auditor John B. McCuskey and/or his designee
11. Arthur Gene Angus
12. Jennifer Bundy
13. Paul Fletcher Adkins
14. Steven Dane Canterbury
15. Kim Ellis
16. Sue Racer-Troy
17. Justin Robinson
18. Aaron Allred
19. Melissa Bishop
20. Adam Fridley
21. Michael Proops
22. Chris Workman
23. Kathleen Gross
24. Shannon Green
25. Kennie Bass
26. Susan Johnson
27. Sandra Johnson
28. Edward E. Weber
29. David R. McCarty
30. Representatives of Geiger Brothers Inc.
31. Jerry Belcher
32. Representatives of Window Fashions
33. Scott E. Harvey
34. Barbara Allen

35. Representatives of the Capitol Building Commission

The Board of Managers reserves the right to amend and/or supplement its response to this request.

**EXPERT WITNESSES**

The Board of Managers reserves the right to disclose expert witnesses.

A handwritten signature in blue ink that reads "JOHN H. SHOTT" followed by a stylized flourish.

JOHN H. SHOTT  
Board of Managers  
WV House of Delegates  
1900 Kanawha Boulevard, East  
Room M-418  
State Capitol Complex  
Charleston, WV 25305

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IN RE: The Matter of Impeachment Proceeding  
Against Respondent Retired Justice Robin Davis

**CERTIFICATE OF SERVICE**

I, JOHN H. SHOTT, on behalf of the Board of Managers, do hereby certify that the foregoing "*House of Delegates' Responses to the Respondent's Request of Discovery*" has been upon the following individuals this 5<sup>th</sup> day of September, 2018, by hand delivering a true and exact copy thereof as follows:

Robert B. Allen (WV Bar No. 110)  
Kay Casto & Chaney PPLC  
707 Virginia Street, East, Suite 1500  
P.O. Box 2031  
Charleston, WV 25327  
(304) 345-8900  
*Via electronic mail*

Lee Cassis  
Clerk of the West Virginia Senate  
1900 Kanawha Boulevard, East  
Room M-211  
State Capitol Complex  
Charleston, WV 25305  
*Via electronic mail*



JOHN H. SHOTT  
Board of Managers  
WV House of Delegates  
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